

Craig S. Friedman (CF-1988)
Matthew W. Lampe (*pro hac vice*)
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222 East 41st Street
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Attorneys for Defendant

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MARIA JACKSON,

Plaintiff,

-against-

THE SCOTTS COMPANY

Defendant.


08 Civ. 1064 (LAK)

NOTICE OF MOTION

PLEASE TAKE NOTICE, that upon the annexed Declaration of Craig S. Friedman, dated June 4, 2008, together with the exhibits thereto, and the accompanying memorandum of law, Defendant The Scotts Company LLC (incorrectly named in the Complaint as "The Scotts Company") will move this Court, before the Honorable Lewis A. Kaplan, United States District Judge, United States Courthouse, 500 Pearl Street, New York 10007, pursuant to Federal Rule of Civil Procedure 11 for sanctions against Plaintiff and Plaintiff's counsel, Sandra Frelix, Esq.

Dated: June 4, 2008

JONES DAY


Craig S. Friedman (CF-1988)
Matthew W. Lampe (*pro hac vice*)
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Attorneys for Defendant

TO: Sandra Frelix, Esq.
110 Wall Street, 11th Floor
New York, New York 10005

UNITED STATES DISTRICT COURT
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MARIA JACKSON,

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Defendant.

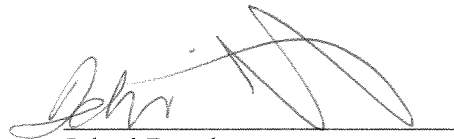
08 Civ. 1064 (LAK)

CERTIFICATE OF SERVICE

JELANI BROOKS certifies the following:

1. That on June 4, 2008 I served by hand, by personally delivering to and leaving with, a true and correct copy of the foregoing documents: **NOTICE OF MOTION** for sanctions pursuant to Federal Rule of Civil Procedure 11, **DECLARATION OF CRAIG S. FRIEDMAN**, and the exhibits thereto, and **MEMORANDUM OF LAW IN SUPPORT OF DEFENDANT'S MOTION FOR SANCTIONS PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 11**, all upon **SANDRA FRELIX, ESQ.**, by Personal Delivery, via Mr. C. Citrin, who identified himself as a person authorized to accept hand deliveries and other packages on behalf of Sandra Frelux, Esq., which service was affected at the actual place of business indicated below:

110 Wall Street
New York, New York 10005


Jelani Brooks